

1 notes between each e-mail.

2 Q. Okay. And with respect to the documents  
3 that you produced in this case, did you search your  
4 e-mail messages for communications from Netflix  
5 forwarding notes or comments about the series?

6 A. Yes. My recollection is I -- I searched  
7 anything to or from anyone at Netflix and gave that  
8 to my attorneys.

9 Q. Okay. So irrespective of the question  
10 whether the notes that follow specific e-mail are the  
11 attachments to that e-mail, if those documents were  
12 produced by Chrome in this case and they consist of  
13 notes or outlines, those would have been documents  
14 that were maintained in Chrome's records as copies of  
15 notes and comments that were received from Netflix  
16 during the production of "Making a Murderer,"  
17 correct?

18 A. Yes, they would have been in my e-mails.

19 Q. And then directing your attention -- or,  
20 strike that.

21 MS. BARKER: Mr. Videographer, could you  
22 please hand to the witness the exhibit marked 52.

23 THE VIDEOGRAPHER: 52.

24 THE WITNESS: Yes. Okay. I have that.

25 Q. (BY MS. BARKER): I will direct your

EXHIBIT

13

1 attention to a document that is -- I'll count the  
2 pages from the back -- approximately 8 pages from the  
3 back -- or, the last page of the document  
4 Bates-stamped CHRM000481 in the lower right-hand  
5 corner.

6 A. Okay. I'm on that document.

7 Q. On the -- approximately the lower third  
8 of the page, is there a copy of an e-mail message  
9 that was sent by you as part of an e-mail thread with  
10 individuals involved in the production of the trailer  
11 for "Making a Murderer"?

12 A. Yeah. I can see that on December 6th,  
13 I'm writing an e-mail. I can't quite tell who it's  
14 to, given this. But yes, it's about the trailer.

15 Q. And that e-mail message continues on to  
16 page 482 of the document; is that correct?

17 A. Yes.

18 Q. And let's see if I can find another copy  
19 that -- in that exhibit that...

20 A. It looks like it's to this Kleoniki  
21 Wilson.

22 Q. Okay. All right. Is that consistent  
23 with your recollection of who you would have been  
24 sending that message to?

25 A. I don't remember that person. It looks

Brown & Jones  
A Veritext